IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the application of:	Attny Docket No.: 23419-057
Craig W. BARNETT et al.	
Serial No.: *to be assigned*	Examiner: *to be assigned*
Filing Date: *Herewith*	Art Unit: *to be assigned*

For:

**METHOD AND SYSTEM FOR ELECTRONIC DISTRIBUTION
OF PRODUCT REDEMPTION COUPONS**

The Assistant Commissioner for Patents
Washington, D.C. 20231

PRELIMINARY AMENDMENT AND REQUEST FOR A DECLARATION OF INTERFERENCE WITH U.S. PATENT NO. 6,075,971

Dear Sir:

Please amend the continuation application filed herewith as follows:

Express Mail No. EL708406669US

AMENDMENTS

In the Specification:

On page 1 and before the section entitled "BACKGROUND OF THE INVENTION," please insert the following new paragraph:

--This application is a continuation of U.S. Patent Application No. 08/425,185, filed April 19, 1995 (status pending).--

In the Claims:

Please cancel claims 1-46 without prejudice.

Please add new claims 47-60:

--47. (New) A method comprising:

determining a target audience of one or more users of devices coupled to a network, wherein the target audience is determined based on one or more preferences of the users stored in the respective users' devices; and

providing a coupon to the target audience determined, wherein each coupon may be used a predetermined number of times, wherein providing a coupon to the target audience further comprises:

determining a subset of users of the network based on a preference profile;

delivering one or more coupons to the subset of users; and

monitoring redemption of the one or more coupons such that each coupon may be used a predetermined number of times.

48. (New) The method of claim 47, wherein determining a target audience further comprises:

monitoring network usage by the users;

determining a preference profile for respective users, wherein the preference profile is based on network usage by the respective users; and

selecting a subset of users of the network based on the preference profile.

49. (New) The method of claim 47, wherein determining a target audience further comprises:

determining a preference profile for respective users, wherein the preference profile is based on revealed preferences of the respective users; and

selecting a subset of users of the network based on the preference profile.

50. (New) The method of claim 47, wherein monitoring redemption of the one or more coupons further comprises:

maintaining a coupon database that stores information related to coupons that have been distributed; and

checking the coupon database to determine whether a particular coupon is valid.

51. (New) The method of claim 47, wherein monitoring redemption the one or more coupons further comprises serializing the coupons such that each coupon may be redeemed once.

52.   (New) An apparatus for providing coupons to a device coupled to a network comprising:

means for determining a target audience of one or more users of devices coupled to the network, wherein the target audience is determined based on one or more preferences of respective users stored in the respective client devices; and

means for providing a coupon to the target audience, wherein each coupon may be used a predetermined number of times, wherein means for providing a coupon to the target audience further comprises:

means for determining a subset of users of the network based on a preference profile;

means for delivering one or more coupons to the subset of users; and

means for monitoring redemption of the one or more coupons such that each coupon may be used a predetermined number of times.

53.   (New) The apparatus of claim 52, wherein means for determining a target audience further comprises:

means for monitoring network usage of users;

means for determining a preference profile for respective users, wherein the preference profile is based on network usage by the respective users and is stored in respective user client devices; and

means for selecting a subset of users of the network based on the preference profile.

54.   (New) The apparatus of claim 52, wherein means for determining a target audience further comprises:

means for determining a preference profile for respective users, wherein the preference profile is based on revealed preferences of the respective users; and

means for selecting a subset of users of the network based on the preference profile.

55.   (New) The apparatus of claim 52, wherein means for monitoring redemption of the one or more coupons further comprises:

means for maintaining a coupon database that stores information related to coupons that have been distributed; and

means for checking the coupon database to determine whether a particular coupon is valid.

56.   (New) The apparatus of claim 52, wherein means for monitoring the one or more coupons further comprises means for serializing the coupons such that each coupon may be redeemed once.

57.   (New) A machine readable medium having stored thereon sequences of instructions that, when executed by one or more processors, cause an electronic device to:

determine a target audience of one or more users of devices coupled to the network, wherein the target audience is determined based on one or more preferences of respective users stored in the respective client devices; and

provide a coupon to the target audience, wherein each coupon may be used a predetermined number of times, wherein the sequences of instructions that cause the

electronic device to provide a coupon to the target audience further comprises sequences of instructions that, when executed, cause the electronic device to:

determine a subset of users of the network based on a preference profile;

deliver one or more coupons to the subset of users; and

monitor redemption of the one or more coupons such that each coupon may be used a predetermined number of times.

58.   (New) The machine readable medium of claim 57, wherein the sequences of instructions that cause the electronic device to determine a target audience further comprises sequences of instructions that, when executed, cause the electronic device to:

monitor network usage of users;

determine a preference profile for respective users, wherein the preference profile is based on network usage by the respective users; and

select a subset of users of the network based on the preference profile.

59.   (New) The machine readable medium of claim 57, wherein the sequences of instructions that cause the electronic device to determine a target audience further comprises sequences of instructions that, when executed, cause the electronic device to:

determine a preference profile for respective users, wherein the preference profile is based on revealed preferences of the respective users; and

select a subset of users of the network based on the preference profile.

60. (New) The machine readable medium of claim 57, wherein the sequences of instructions that cause the electronic device to monitor redemption of the one or more coupons further comprises sequences of instructions that, when executed, cause the electronic device to:

maintain a coupon database that stores information related to coupons that have been distributed; and

check the coupon database to determine whether a particular coupon is valid.--

REMARKS

Claims 1-46 have been canceled. Claims 47-60 have been added. No new matter is added by these cancellations or additions. Claims 47-60 are now pending, with claims 47, 52, and 57 being in independent form. Claims 47-60 correspond identically to claims 1-14 of U.S. Patent No. 6,075,971 (the '971 patent) and have been added for the purpose of provoking an interference with that patent.

A.   Effective Filing Dates

This application is a continuation of U.S. Patent Application No. 08/425,185, filed April 19, 1995 (status pending). Thus, the effective filing date of this application is April 19, 1995. The effective filing date of the '971 patent is March 27, 1998.

B.   37 C.F.R. 1.607

Applicants submit the following information as required by 37 C.F.R. 1.607(a)(1)-(a)(5). The '971 patent issued on June 13, 2000. Therefore, claims 47-60 of the present application were pending within one year of the issue date of the '971 patent and no explanation under 37 C.F.R. 1.607(a)(6) is necessary.

(1)   Identification of Patent

In accordance with 37 C.F.R. 1.607(a)(1), Applicants request that an interference be declared between the application filed herewith and U.S. Patent No. 6,075,971 (the '971 patent).

(2)   Proposed Count

In accordance with 37 C.F.R. 1.607(a)(2), Applicants present the following proposed

count, which corresponds identically to claim 47 presented herein and to claim 1 of the '971

patent:

A method comprising:

determining a target audience of one or more users of devices coupled to a network,

wherein the target audience is determined based on one or more preferences of the users

stored in the respective users' devices; and

providing a coupon to the target audience determined, wherein each coupon may be

used a predetermined number of times, wherein providing a coupon to the target audience

further comprises:

determining a subset of users of the network based on a preference profile;

delivering one or more coupons to the subset of users; and

monitoring redemption of the one or more coupons such that each coupon may be

used a predetermined number of times.

(3)   Corresponding Claims of the '971 Patent

In accordance with 37 C.F.R. 1.607(a)(3), Applicants identify claims 1-14 of the '971

patent as corresponding to the proposed count.

(4)   Corresponding Claims of the Present Application

In accordance with 37 C.F.R. 1.607(a)(4), Applicants identify at least claims 47-60 of

the present application as corresponding to the proposed count. Claim 47 corresponds exactly

to the proposed count. The remaining claims define the same patentable invention as claim

47 and therefore correspond to the proposed count.

(5)   Application of Claims 47-60 to the Specification of the Present Application

In accordance with 37 C.F.R. 1.607(a)(5), Applicants submit the following tables that indicate that claims 47-60 are supported by the specification of the application submitted herewith. The citations therein are exemplary only and not exclusive.

Independent Claim 47 and Dependents

Claim Terms	Exemplary Citations to Specification of Present Application
47. A method comprising:	
determining a target audience of one or more users of devices coupled to a network, wherein the target audience is determined based on one or more preferences of the users stored in the respective users' devices; and	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30.
providing a coupon to the target audience determined,	Page 11, line 25 to page 12, line 2; page 12, lines 23-25; page 17, lines 22-26; page 29, line 1 to page 30, line 10.
wherein each coupon may be used a predetermined number of times,	Page 12, line 26 to page 13, line 2; page 16, line 17 to page 17, line 13; page 25, line 29 to page 26, line 12.
wherein providing a coupon to the target audience further comprises: determining a subset of users of the network based on a preference profile;	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10.
delivering one or more coupons to the subset of users; and	Page 11, lines 25 to page 12, line 2; page 12, lines 23-25; page 17, lines 22-26; page 29, line 1 to page 30, line 10.
monitoring redemption of the one or more coupons such that each coupon may be used a predetermined number of times.	Page 12, line 26 to page 13, line 2; page 16, line 17 to page 17, line 13; page 25, line 29 to page 26, line 12; Figure 1, elements 12 and 13.
48. The method of claim 47, wherein determining a target audience further comprises: monitoring network usage by the users;	Page 11, line 25 to page 12, line 2; page 12, lines 26-29; page 16, lines 17-20; page 17, lines 7-12; page 25, lines 1-5; page 29, lines 7-10, Figure 1, elements 12 and 13.
determining a preference profile for respective users, wherein the preference profile is based on network usage by the respective users; and	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10; page 15, lines 23-25.
selecting a subset of users of the network based on the preference profile.	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, elements 11

	and 17; Figure 2, element 30; page 29, line 29 to page 30, line 10.
49. The method of claim 47, wherein determining a target audience further comprises: determining a preference profile for respective users, wherein the preference profile is based on revealed preferences of the respective users; and	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10; Figure 10, element 11.
selecting a subset of users of the network based on the preference profile.	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10; Figure 10, element 11.
50. The method of claim 47, wherein monitoring redemption of the one or more coupons further comprises: maintaining a coupon database that stores information related to coupons that have been distributed; and	Page 12, lines 26 to page 13, line 2; page 16, lines 17-20; Figure 1, element 12.
checking the coupon database to determine whether a particular coupon is valid.	Page 12, line 26 to page 13, line 2; page 16, line 17 to page 17, line 5; page 25, line 15 to page 26, line 12.
51. The method of claim 47, wherein monitoring redemption the one or more coupons further comprises serializing the coupons such that each coupon may be redeemed once.	Page 12, lines 19-22; page 16, line 22 to page 17, line 5; page 25, line 15 to page 26, line 12; Figure 5, element 90.

Independent Claim 52 and Dependents

Claim Terms	Exemplary Citations to Specification of Present Application
52. An apparatus for providing coupons to a device coupled to a network comprising:	Figure 1; Page 9, line 27 to page 10, line 17.
means for determining a target audience of one or more users of devices coupled to the network, wherein the target audience is determined based on one or more preferences of respective users stored in the respective client devices; and	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30.
means for providing a coupon to the target audience,	Page 11, line 25 to page 12, line 2; page 12, lines 23-25; page 17, lines 22-26; page 29, line 1 to page 30, line 10.
wherein each coupon may be used a predetermined number of times,	Page 12, line 26 to page 13, line 2; page 16, line 17 to page 17, line 13; page 25, line 29 to page 26, line 12.
wherein means for providing a coupon to the target audience further comprises: means for determining a subset of users of the network based on a preference profile;	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10.
means for delivering one or more coupons to the subset of users; and	Page 11, lines 25 to page 12, line 2; page 12, lines 23-25; page 17, lines 22-26; page 29, line 1 to page 30, line 10; Figure 1, element 2.
means for monitoring redemption of the one or more coupons such that each coupon may be used a predetermined number of times.	Page 12, line 26 to page 13, line 2; page 16, line 17 to page 17, line 13; page 25, line 29 to page 26, line 12; Figure 1, elements 12 and 13.
53. The apparatus of claim 52, wherein means for determining a target audience further comprises: means for monitoring network usage of users;	Page 11, line 25 to page 12, line 2; page 12, lines 26-29; page 16, lines 17-20; page 17, lines 7-12; page 25, lines 1-5; page 29, lines 7-10, Figure 1, elements 12 and 13.
means for determining a preference profile for respective users, wherein the preference profile is based on network usage by the respective users and is stored in respective user client devices; and	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10; page 15, lines 23-25.

means for selecting a subset of users of the network based on the preference profile.	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, elements 11 and 17; Figure 2, element 30; page 29, line 29 to page 30, line 10.
54. The apparatus of claim 52, wherein means for determining a target audience further comprises: means for determining a preference profile for respective users, wherein the preference profile is based on revealed preferences of the respective users; and	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10; Figure 10, element 11.
means for selecting a subset of users of the network based on the preference profile.	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10; Figure 10, element 11.
55. The apparatus of claim 52, wherein means for monitoring redemption of the one or more coupons further comprises: means for maintaining a coupon database that stores information related to coupons that have been distributed; and	Page 12, lines 26 to page 13, line 2; page 16, lines 17-20; Figure 1, element 12.
means for checking the coupon database to determine whether a particular coupon is valid.	Page 12, line 26 to page 13, line 2; page 16, line 17 to page 17, line 5; page 25, line 15 to page 26, line 12.
56. The apparatus of claim 52, wherein means for monitoring the one or more coupons further comprises means for serializing the coupons such that each coupon may be redeemed once.	Page 12, lines 19-22; page 16, line 22 to page 17, line 5; page 25, line 15 to page 26, line 12; Figure 5, element 90.

Independent Claim 57 and Dependents

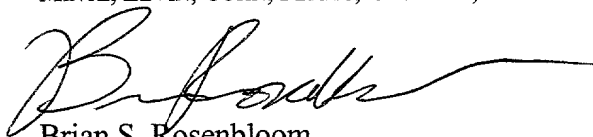| Claim Terms	Exemplary Citations to Specification of Present Application
57. A machine readable medium having stored thereon sequences of instructions that, when executed by one or more processors, cause an electronic device to:	
determine a target audience of one or more users of devices coupled to the network, wherein the target audience is determined based on one or more preferences of respective users stored in the respective client devices; and	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30.
provide a coupon to the target audience,	Page 11, line 25 to page 12, line 2; page 12, lines 23-25; page 17, lines 22-26; page 29, line 1 to page 30, line 10.
wherein each coupon may be used a predetermined number of times,	Page 12, line 26 to page 13, line 2; page 16, line 17 to page 17, line 13; page 25, line 29 to page 26, line 12.
wherein the sequences of instructions that cause the electronic device to provide a coupon to the target audience further comprises sequences of instructions that, when executed, cause the electronic device to: determine a subset of users of the network based on a preference profile;	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10.
deliver one or more coupons to the subset of users; and	Page 11, lines 25 to page 12, line 2; page 12, lines 23-25; page 17, lines 22-26; page 29, line 1 to page 30, line 10; Figure 1, element 2.
monitor redemption of the one or more coupons such that each coupon may be used a predetermined number of times.	Page 12, line 26 to page 13, line 2; page 16, line 17 to page 17, line 13; page 25, line 29 to page 26, line 12; Figure 1, elements 12 and 13.
58. The machine readable medium of claim 57, wherein the sequences of instructions that cause the electronic device to determine a target audience further comprises sequences of instructions that, when executed, cause the electronic device to: monitor network usage of users;	Page 11, line 25 to page 12, line 2; page 12, lines 26-29; page 16, lines 17-20; page 17, lines 7-12; page 25, lines 1-5; page 29, lines 7-10, Figure 1, elements 12 and 13.

determine a preference profile for respective users, wherein the preference profile is based on network usage by the respective users; and	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10; page 15, lines 23-25.
select a subset of users of the network based on the preference profile.	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, elements 11 and 17; Figure 2, element 30; page 29, line 29 to page 30, line 10.
59. The machine readable medium of claim 57, wherein the sequences of instructions that cause the electronic device to determine a target audience further comprises sequences of instructions that, when executed, cause the electronic device to: determine a preference profile for respective users, wherein the preference profile is based on revealed preferences of the respective users; and	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10; Figure 10, element 11.
select a subset of users of the network based on the preference profile.	Page 11, line 25 to page 12, line 2; page 15, lines 23-25; page 17, lines 22-26; page 18, lines 28-30; page 29, lines 1-27; page 24, line 29 to page 30, line 5; Figure 1, element 17; Figure 2, element 30; page 29, line 29 to page 30, line 10; Figure 10, element 11.
60. The machine readable medium of claim 57, wherein the sequences of instructions that cause the electronic device to monitor redemption of the one or more coupons further comprises sequences of instructions that, when executed, cause the electronic device to: maintain a coupon database that stores information related to coupons that have been distributed; and	Page 12, lines 26 to page 13, line 2; page 16, lines 17-20; Figure 1, element 12.
check the coupon database to determine whether a particular coupon is valid.	Page 12, line 26 to page 13, line 2; page 16, line 17 to page 17, line 5; page 25, line 15 to page 26, line 12.

CONCLUSION

For all of the above reasons, Applicants respectfully request that an interference be declared between the present application and the '971 patent. If the Examiner believes that prosecution of this continuation application might be advanced through a personal or telephone interview, the Examiner is invited to call Applicants' undersigned representative.

Respectfully submitted,

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